

1 Jahan C. Sagafi (Cal. Bar No. 224887)
2 OUTTEN & GOLDEN LLP
3 One Embarcadero Center, 38th Floor
4 San Francisco, CA 94111
5 Telephone: (415) 638-8800
6 Facsimile: (415) 638-8810
7 E-mail: jsagafi@outtengolden.com

8 Adam T. Klein (admitted *pro hac vice*)
9 OUTTEN & GOLDEN LLP
10 685 Third Avenue, 25th Floor
11 New York, New York 10017
12 Telephone: (212) 245-1000
13 Facsimile: (646) 509-2060
14 E-mail: atk@outtengolden.com

15 Daniel Kohrman (admitted *pro hac vice*)
16 Laurie McCann (admitted *pro hac vice*)
17 Dara Smith (admitted *pro hac vice*)
18 AARP FOUNDATION LITIGATION
19 601 E. Street, N.W.
20 Washington, D.C. 20049
21 Telephone: (202) 434-2060
22 Facsimile: (202) 434-2082
23 E-mail: dkohrman@aarp.org
24 E-mail: lmccann@aarp.org
25 E-mail: dsmith@aarp.org

26 Jennifer L. Liu (Cal. Bar No. 279370)
1 THE LIU LAW FIRM, P.C.
2 1170 Market Street, Suite 700
3 San Francisco, CA 94102
4 Telephone: (415) 896-4260
5 Facsimile: (415) 231-0011
6 E-mail: jliu@liulawpc.com

11 *Attorneys for Plaintiffs and Proposed Class and Collective Members*

12 Michael P. Esser (Cal. Bar No. 268634)
13 KIRKLAND & ELLIS LLP
14 555 California Street
15 San Francisco, CA 94104
16 Telephone: (415) 439-1400
17 Facsimile: (415) 439-1500
18 E-mail: michael.esser@kirkland.com

19 Emily Nicklin (admitted *pro hac vice*)
20 Gabor Balassa (admitted *pro hac vice*)
21 Christina Briesacher (admitted *pro hac vice*)
22 Mark Premo-Hopkins (admitted *pro hac vice*)
23 KIRKLAND & ELLIS LLP
24 300 N. LaSalle
25 Chicago, IL 60654
26 Telephone: (312) 862-2000
1 Facsimile: (312) 862-2200
2 E-mail: emily.nicklin@kirkland.com
3 E-mail: gabor.balassa@kirkland.com
4 E-mail: christina.briesacher@kirkland.com
5 E-Mail: mark.premohopkins@kirkland.com

17 *Attorneys for Defendant*

18
19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 STEVE RABIN and JOHN CHAPMAN,
23 on behalf of themselves, and all others
similarly situated,

24 Plaintiffs,

25 v.

26 PRICEWATERHOUSECOOPERS LLP,

Defendant.

Case No. 16-cv-02276-JST

STIPULATION AND ~~PROPOSED~~ ORDER
RE JOINT LETTER BRIEF ON DATA
DISCOVERY

Hon. Judge Jon S. Tigar

1 Plaintiffs Steve Rabin and John Chapman (“Plaintiffs”) and Defendant
2 PricewaterhouseCoopers LLP (“PwC”) (collectively, “the Parties”) hereby stipulate and agree as
3 follows:

4 WHEREAS, on February 16, 2017, Plaintiffs and PricewaterhouseCoopers LLP
5 participated in a telephonic hearing with the Court regarding ongoing discovery disputes;

6 WHEREAS, the Court’s Minute Order, ECF No. 72, instructed the Parties, among other
7 things, to submit a joint letter brief by March 3, 2017 concerning the Parties’ dispute regarding
8 Plaintiffs’ request for production of data from PwC;

9 WHEREAS, because one argument asserted by PwC relates to the burden entailed in
10 production of these data, the Parties believe that the briefing will be more useful to the Court after
11 Plaintiffs have taken a deposition of PwC’s corporate designee regarding certain topics related to
12 the SourceOne database system, which houses information regarding applicants, including the
13 issue of burden of responding to Plaintiffs’ request for data fields;

14 WHEREAS, the Parties have scheduled the deposition for March 15;

15 WHEREAS, Plaintiffs have agreed not to seek leave, prior to the deposition, to extend the
16 deposition beyond seven hours;

17 WHEREAS, the Parties will exchange draft text of the joint letter brief after that
18 deposition, under the following schedule:

19 Wednesday, March 22: Plaintiffs provide draft text to PwC

20 Wednesday, March 29: PwC provides draft text to Plaintiffs

21 Wednesday, April 5: The Parties file their joint letter with the Court

22 WHEREAS, because of the complexity of the issues involved, the Parties request that the
23 page limit be extended to a total of ten pages, with each side allowed at most five pages.

24 THEREFORE, IT IS HEREBY STIPULATED that:

- 25 • the Parties will submit a joint letter brief regarding Plaintiffs’ request for data
26 discovery by April 5, 2017; and
• the page limit is extended to ten pages, with at most five pages allocated per party.

Respectfully submitted,

Dated: March 2, 2017

By: /s/ Jahan C. Sagafi
Jahan C. Sagafi

Jahan C. Sagafi (Cal. Bar No. 224887)
OUTTEN & GOLDEN LLP
One Embarcadero Center, 38th Floor
San Francisco, CA 94111
Telephone: (415) 638-8800
Facsimile: (415) 638-8810
E-mail: jsagafi@outtengolden.com

Adam T. Klein (admitted *pro hac vice*)
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor
New York, New York 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060
E-mail: atk@outtengolden.com

Daniel Kohrman (admitted *pro hac vice*)
Laurie McCann (admitted *pro hac vice*)
Dara Smith (admitted *pro hac vice*)
AARP FOUNDATION LITIGATION
601 E. Street, N.W.
Washington, D.C. 20049
Telephone: (202) 434-2060
Facsimile: (202) 434-2082
E-mail: dkohrman@aarp.org
E-mail: lmccann@aarp.org
E-mail: dsmith@aarp.org

Jennifer L. Liu (Cal. Bar No. 279370)
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, CA 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
E-mail: jliu@liulawpc.com

Counsel for Plaintiffs and Proposed Class and Collective Members

1 Dated: March 2, 2017

By: /s/ Gabor Balassa
Gabor Balassa

2 Emily Nicklin (*pro hac vice*)
3 Gabor Balassa (*pro hac vice*)
4 Christina Briesacher (*pro hac vice*)
5 Mark Premo-Hopkins (*pro hac vice*)
KIRKLAND & ELLIS LLP
300 North LaSalle
Chicago, IL 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
E-mail: christina.briesacher@kirkland.com
E-mail: gabor.balassa@kirkland.com
E-Mail: christina.briesacher@kirkland.com
E-Mail: mark.premohopkins@kirkland.com

10 Michael P. Esser (Cal. Bar No. 268634)
11 KIRKLAND & ELLIS LLP
12 555 California Street
13 San Francisco, CA 94104
14 Telephone: (415) 439-1400
Facsimile: (415) 439-1500
E-mail: michael.esser@kirkland.com

15 *Attorneys for Defendant*

26

1 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.
2
3
4 Date: March 7, 2017
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26



Honorable Jon S. Tigar
United States District Judge

ATTESTATION OF SIGNATURE

Pursuant to Civil Local Rule 5-1(i)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the other signatory above.

Dated: March 2, 2017

OUTTEN & GOLDEN LLP

By: /s/ Jahan C. Sagafi

Jahan C. Sagafi

Attorneys for Plaintiffs